

## **Exhibit M**

**Estate of Alfred Borowski**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

ELAINE E. MANDELKOW., et al.,

**AFFIDAVIT OF LISA LACY**

Plaintiffs,

20-CV-00315 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

STATE OF NEW JERSEY )  
: SS.:  
COUNTY OF OCEAN )

LISA LACY, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 13 Alyssa Rose Lane, New Egypt, NJ 08533.

2. My current age is 55, having been born on February 16, 1967.

3. I am the daughter of Alfred Borowski, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of the claim on behalf of my father's estate.

4. My father passed away from lung cancer on May 14, 2014. It was determined by the World Trade Center Health Program that this illness was causally connected to his exposure to toxins resulting from the 9/11 terrorist attacks.

5. On June 25, 2014, I was appointed personal representative of my father's estate by the Middlesex County, New Jersey Surrogate's Court.

6. My father was heavily involved in my life. I'm a mother of triplets, plus another daughter. He basically lived in my house Monday through Friday, helping me take care of my children. He was a full-time, live-in grandfather. He would help my husband and me with the house and the lawn. We would have movie night, pizza night, and bagel breakfasts. He would go

to all of my kids' soccer games, football games, and Boy Scouts trips. He was a huge influence for my son, who became an Eagle Scout because of his grandfather. My father was also a marine, and my son went into the service to honor his grandfather. We went on summer vacations as a family.

7. My dad was a night manager for Verizon, on the Operations team. He went to the World Trade Center site on the morning of 9/11/2001 and didn't come back until the early morning hours of the next day. He worked around the clock at Ground Zero until the end of November 2001. He said it was absolutely horrific. He traveled across the rubble on a four-wheeler, because the debris was too hot to walk on. He saw limbs, pictures, and wedding rings lying in the wreckage. He watched cadaver dogs sniff out bodies. Within a day, he said he knew there were not going to be any survivors. He was formerly a Marine and had never seen anything so bad. He told me that the smell of the bodies burning alone was horrific; it stayed with him for the rest of his life.

8. At the end of November 2001, my father began to have skin irritation. He developed lung issues and was constantly short of breath. His eyes were bloodshot from all the particles of dust flying around at Ground Zero. Within a year, his lungs weren't clearing up like they should've been, and his limbs were swelling. He was seeing heart specialists and pulmonologists; it was just doctors' visits non-stop. He was seen by the World Trade Center Health Program doctors as well. It started off with minor stuff, like a chronic cold, which then would build into bronchitis and then pneumonia. In January 2014, he went to Robert Wood Johnson University Hospital for what we thought was pneumonia, but a lung fluid sample showed that he had lung cancer. I was devastated to learn that he was diagnosed with lung cancer. He passed within weeks of us finding out.

9. When his symptoms started to progress, he developed severe back issues. His back and legs became swollen and uncomfortable to the point that he could not walk. His feet were so swollen that he could no longer wear shoes. He had trouble retaining water in his legs and would have to go through painful procedures to get his legs drained. He was in so much pain, and the doctors could only do so much. Simple tasks like showering or getting up the stairs became very difficult because he could not lift his legs. He was always coughing and could hardly walk a few steps without gasping for air. He was a proud man and refused an oxygen tank. At one point, he could no longer sleep in a bed. We ordered him a recliner, and he

slept in a chair until the day that he died.

10. The illness took a toll on his emotional health and well-being. He became irritated by all the treatments and the doctor's appointments. Toward the end, depression started to set in. He declined chemotherapy because he wanted to die peacefully.

11. My husband, my children and I all loved my father to pieces. It was a full-family effort, taking care of him. My father was only six months until his retirement when he started getting sick, and it was stolen from him by the illness. He was a loving father and grandfather. He has missed out on weddings and other milestones. He brought so much to the table. He was so close to retirement and was working his whole life. I believe there should be representation for my father's name.



LISA LACY

Sworn to before me this  
5 day of ~~April~~, 2022 May 2022

Mary Ellen Hunsicker  
Notary Public  
MARY ELLEN HUNSICKER  
NOTARY PUBLIC OF NEW JERSEY  
My Commission Expires July 8, 2023

**Estate of James Bruzza**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
ELAINE E. MANDELKOW., et al.,

**AFFIDAVIT OF  
KATHLEEN E. BRUZZA**

Plaintiffs,

20-CV-00315 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X  
STATE OF NEW JERSEY )  
: SS.:  
COUNTY OF OCEAN )

KATHLEEN E. BRUZZA, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 123 Bridle Path, Bayville NJ 08721.

2. My current age is 78, having been born on November 14, 1943.

3. I am the wife of James Bruzza, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of the claim on behalf of my husband's estate.

4. My husband passed away from acute myeloid leukemia on June 12, 2018. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. On October 1, 2018, I was appointed personal representative of my husband's estate by the Circuit Court for Brevard County, Florida Probate Division.

6. James and I did everything together. We danced, went out on our boat, and we did everything else together. Any customers or anything that he had, we entertained. He was the

best thing that ever happened to me.

7. James worked for the New York Stock Exchange. He helped with triage efforts on 9/11/2001. There were people running away from the World Trade Center collapse, and James was pulling them off the streets and into the NYSE Building (located at 13 Wall Street). He was helping people, getting them water and medical care in the building. These people were startled and covered with dust. He tried to help as much as he could. He was that kind of person. James couldn't come home that night, but we lived in the exposure zone as well. We lived in Gateway Plaza in Battery Park City. He came home the next day and returned to the stock exchange as soon as it re-opened. He worked there continuously until 2008.

8. James immediately became depressed after 9/11. He had seen a lot. Doctors put him on Lexapro for the depression and Altace for hypertension. When he left work in 2008, he went on COBRA for insurance. After his COBRA was done, we were denied regular insurance. James was a changed person after 9/11. He had so many friends in the towers who died that day. He was always outgoing and lots of fun, but he really changed after the attacks on the World Trade Center. The depression came from losing so many people he loved.

9. Later on, he started to struggle with his health. In 2015, he was diagnosed with dermatofibrosarcoma protuberans (DFSP) cancer, and had to undergo a surgery to remove the tumors. After the surgery, he constantly felt a burning sensation in his scalp, neck, and ears. In December 2016, he began to experience atrial fibrillation. He had to undergo an ablation in order to treat it. He also had bouts of fainting. One of the times that he fainted, we took him to the emergency room. They did blood work and a bone marrow test on him and found out that he had acute myeloid leukemia (AML). That was in November 2017.

10. His life really, really changed. We retired to Florida, and James would play golf and enjoy his life. Everything changed once he got sick. Our life was going to and from hospitals, and he was always feeling ill. I would take him to Moffitt Hospital in Tampa for chemotherapy and radiation. We lived three hours away, and it was a long drive. He took a ton of medications. After the chemotherapy and radiation, he experienced a lot of side effects. He had a huge rash, diarrhea, and fatigue. Additionally, his illness caused him further depression. It was an emotionally hard time for him. He couldn't do anything that he enjoyed anymore, not even going for walks. It was horrible. James went for a stem cell transplant, and it put his body through hell. Without the transplant, he wouldn't last for more than two years. But his body

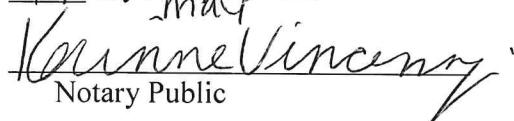
rejected the transplant. He suffered a lot.

11. My whole world fell apart. My family was all back in New Jersey and I didn't have anybody to help me. I was on my own. It was devastating. It was very hard to see someone I loved so much suffer. Everyone loved James. He was such a great guy. My family misses him so much, and I also miss him terribly.

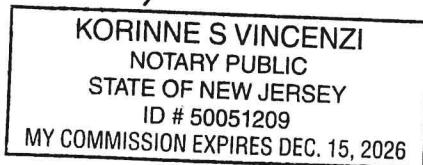


KATHLEEN BRUZZA

Sworn to before me this  
19 day of April, 2022



KORINNE S. VINCENZI  
Notary Public



## **Estate of Maryann Campbell**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
ELAINE E. MANDELKOW., et al.,

Plaintiffs,

20-CV-00315 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X  
STATE OF NEW JERSEY )  
: SS.:  
COUNTY OF UNION )

LAURENCE B. CAMPBELL, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 5 Fairview Road, Clark, NJ 07066.

2. My current age is 78, having been born on December 3, 1943.

3. I am the husband of Maryann Campbell, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of the claim on behalf of my wife's estate.

4. My wife passed away from liver and eye cancer on April 29, 2014. She was only 55 years old. It was determined that these illnesses were causally connected to the toxins resulting from the September 11, 2001 terrorist attacks.

5. On May 29, 2014, I was appointed personal representative of my wife's estate by the Union County, New Jersey Surrogate's Court.

6. Maryann and I had a fantastic relationship. I had been married and divorced before I met Maryann. I was with Maryann for twenty-five years, and it was a great time. We traveled all over the country, went out with friends, and socialized a lot. We loved to play golf.

Every year, we would go down to Georgia for Thanksgiving. It was wonderful, a great time. Even the year she died, we had planned a trip to New Hampshire. It was always good, it was just unbelievable. She was a wonderful person. No one ever said a bad word about her. When she died, her employer had to hire grief counselors because people were so distraught. If you ever met her, within the first couple of minutes, you'd think she was a great person. She had a good life, and it ended too quickly.

7. Maryann worked for the Federal Reserve. We were actually on vacation on 9/11/2001. We were in Gettysburg, Pennsylvania playing golf. We walked into one of the gift shops, where Rudy Giuliani was on TV. We asked ourselves, "Why is Rudy Giuliani on the news?" Then, the woman at the gift shop counter said, "The bad people knocked down those buildings in New York." Maryann fell to the floor right there. We raced home. Maryann was extremely worried, as she didn't know if her friends or colleagues were safe or killed. After we returned home, Maryann couldn't get back to lower Manhattan for a week or so, as they had shut down the PATH train.

8. Maryann went back to work as soon as she could. Getting to the exposure zone was hard, because much of the public transportation had shut down. But she said, "Those terrorists are not going to take me away from my job." She was so disgusted and upset with the whole ordeal. She kept on working at the Federal Reserve until 2013. We went for a routine eye checkup on a Friday afternoon in March or April of 2013. My wife never complained about anything, but she was having a problem with her eye. The doctor inspected her and sent her to a specialist a few towns over. She was found to have a cancerous tumor in the back of her left eye. Within a week or so, she went to Sloan Kettering so they could shrink the tumor.

9. We took her to see the number one radiologist-oncologist at Sloan Kettering, because we wanted to get Maryann the best treatment. Only one in six million people ever get this kind of eye tumor. When they removed the tumor, she probably lost two thirds of her vision in her left eye. But she never complained. She was happy that she could still do most of the things she wanted to do. She could still drive and go to work. She could still hike and be physically active. She would say, "Other people have it worse." So, for the next few months, everything seemed fine.

10. In April 2014, we took Maryann for another MRI because she felt a little weird. The results showed that she had liver cancer. Sloan Kettering said they could do nothing for her,

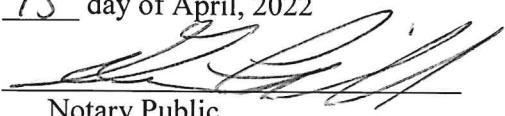
and they blew us off completely. Sloan Kettering didn't want Maryann to die in their hospital. We took Maryann to a local hospital, where they screamed at the Sloan Kettering nurses over the phone. When she got the liver cancer diagnosis, I thought she would get some chemotherapy and be alright. But then, the doctors told us her prognosis was terminal. We both sat there and cried. We knew she was going to die.

11. The last day she was in the hospital, the nurses were giving her medication to keep her comfortable. As I left to go home I said, "I'll see you tomorrow." A friend who was visiting her called and said, "Larry, get back here." They had put Maryann in the ER. By the time I returned to the emergency room, my beautiful wife was yellow from head to toe. She looked like a wall painted yellow. The cancer specialist told me that she wasn't going to make it. They resuscitated her twice, but twice was enough. I had to sign the DNR. Within an hour, she was dead.

12. Maryann was a smart, wonderful person. She went to college, went to night school for her law degree, and passed the bar exam. She got a job at the Federal Reserve, where they loved her. She kept on getting promoted and promoted. Everyone wanted to work for Maryann. She just was a wonderful person. She always helped people. She took care of her sister, who was in a nursing home, and her parents. She was the President of the Auxiliary for the Clark First Aid Squad. Maryann was fourteen years younger than me, and she always said that she'd take care of me when I got old. It's wrong that she was gone. I don't know if anything could have changed, but it should have.

  
LAURENCE B. CAMPBELL

Sworn to before me this  
15 day of April, 2022

  
Notary Public



**Estate of Norma Carroll**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
ELAINE E. MANDELKOW., et al.,

Plaintiffs,

20-CV-00315 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X  
STATE OF PENNSYLVANIA )  
                          :  
COUNTY OF MONROE     )

EDWARD J. CARROLL, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 119 Steep Hill Road, Cresco, PA 18326.

2. My current age is 67, having been born on October 14, 1954.

3. I am the husband of Norma Carroll, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of the claim on behalf of my wife's estate.

4. My wife passed away from glioblastoma on February 14, 2013. It was medically determined that this illness was causally connected to her exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. On August 20, 2014, I was appointed personal representative of my wife's estate by the Register for the Probate of Wills, Monroe County, Pennsylvania.

6. Norma was everything to me. We did everything together. We were social people, and we spent a lot of time together. We tried to have fun whenever we could, and we did. We entertained a lot, we had a pool in the backyard, and we liked to have friends over. We went out

to dinner, to the movies, and things like that. Unfortunately, I met Norma late in life. We were together for over ten years.

7. On September 11, 2001, Norma was working in downtown Manhattan as a paralegal at the law firm Sher Herman Bellone Tipopgrahe. I didn't meet Norma until 2003, so I only know what she told me about her experience on 9/11. She was paranoid about the whole thing. She saw bodies, people jumping from the towers. It really freaked her out. She had to walk over the Brooklyn bridge and was covered in white dust. She eventually returned to Manhattan for work after 9/11, but she started getting sick soon after.

8. Norma started to visit doctors from the World Trade Center Health Program, and within about two years after 9/11, she started to show some negative health symptoms. She wasn't a complainer, but sometimes she'd tell me that she had acid reflux and trouble breathing. She was diagnosed with gastro-esophageal reflux disease (GERD) and asthma. In 2009, she accompanied me to a doctor's visit. The doctor asked her, "Do you feel alright? Something seems off." He brought her in to do some scans. That's when they came back with the brain cancer diagnosis. She had glioblastoma.

9. She did chemotherapy, radiation, everything. I brought her every few weeks for her treatment. I would drive her from Pennsylvania to Brooklyn for treatment, because we wanted her to see a cancer specialist in New York. It was horrible for her. She was very claustrophobic and hated getting in the machine for the MRIs. It was a disaster. She also had two brain surgeries. They told her that they had removed the whole tumor, but obviously they didn't. They got what they could. She was constantly undergoing treatments. When Norma was first diagnosed, they told me she wouldn't last six months. But we wound up with three years.

10. The brain tumor took a toll on Norma's health. She was having trouble with her vision and was getting headaches all the time. She became withdrawn, as she was in a lot of pain. She became lethargic from all the pain medication. The brain cancer also impacted her emotionally and mentally. She was so young when she was diagnosed, only fifty-three years old. I think she felt beat up for being in this situation at such a young age. She wanted to enjoy her retirement and the later times in our lives.

11. Norma came from a difficult life. She was a single mother who raised two children, and she did what she had to do. When we got together, she always said she said that she didn't have anything to worry about anymore. We enjoyed each other's company. We kept

to ourselves, moved out here to the Poconos and built a house. We made a life for ourselves. She was a good, hard working woman. I think those who were involved in the 9/11 attacks need to pay, money or otherwise. Norma's life was cut short. Her premature death caused her to lose out so much in life.



Edward J. CARROLL

Sworn to before me this  
25<sup>th</sup> day of April, 2022

Theresa J Shupp-Rosso  
Notary Public

Commonwealth of Pennsylvania - Notary Seal  
Theresa J Shupp-Rosso, Notary Public  
Monroe County  
My commission expires March 25, 2024  
Commission number 1152171

## **Estate of Victor Casaletto**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X

In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
ELAINE E. MANDELKOW, et al.,

**AFFIDAVIT OF  
ANGELINA CASALETTO**

Plaintiffs,

20-CV-00315 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW JERSEY )  
COUNTY OF MONMOUTH ) : SS.:  
                        )

ANGELINA CASALETTO, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 13 Grandview Circle, Farmingdale NJ 07727.

2. My current age is 63, having been born on April 4, 1959.

3. I am the wife of Victor Casaletto, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of the claim on behalf of my husband's estate.

4. My husband passed away from respiratory failure and end stage kidney disease on September 14, 2017. It was medically determined that these illnesses were causally connected to his exposure to toxins resulting from the 9/11 terrorist attacks.

5. On September 20, 2017, I was appointed personal representative of my husband's estate in the Monmouth County, New Jersey Surrogate's Court.

6. We were a very active couple. We traveled, vacationed, and raised three children together. My husband was a big car enthusiast. He worked on restoring race cars. He was also a huge soccer fan, and we would travel to see soccer games as a family. Victor would take care of

our cars, he would maintain our home and property, and he coached our children's soccer teams. We had a wonderful marriage. He was a loving father and a devoted husband. He was a great guy.

7. Victor never drank, never smoked, and had no medical issues before 9/11. His family has longevity—his dad was ninety-two years old when he passed, his mother was in her late eighties. Both of his grandparents lived to a hundred years old. He was a soccer player. Totally healthy.

8. He worked at the New York Stock Exchange as a building engineer. On September 11, 2001, he was at the NYSE Building (located at 13 Wall Street) when the towers came down. He was there in the thick of it. He would tell me about what he saw on that day. He told me there was a woman running down the street barely dressed, with her clothes in tatters. Victor pulled her into the building and gave her a shirt and a bottle of water. She said she was out on the street when the towers came down, and the force of the explosion knocked her off her feet and dragged her through the street. His employer also ordered him to go onto the roof and shut off all the dampers so that the soot wouldn't enter the ventilation system of the building. He was up there on the roof, breathing in all the dust that filled the air. He stayed for five days around the clock at the New York Stock Exchange, getting the building ready to re-open. During that time, he was in and out of the building, helping Con Edison with the clean-up. He continued to work for the New York Stock Exchange until 2005, when he became so ill he couldn't work anymore.

9. Victor's health began to immediately decline after 9/11. He suffered from severe PTSD. He would get headaches and nosebleeds every night. He started having sleep apnea out of the blue. He always felt sick, like he was having the flu. The doctors gave him antibiotics, thinking it was an infection, but the antibiotics didn't do anything. He was diagnosed with renal failure on December 27, 2005. His blood pressure skyrocketed, which caused the doctors to be perplexed. The nurse said with his blood pressure, he should be having a heart attack. We couldn't believe the renal failure, because he was such a healthy person before 9/11 with no family history of kidney disease. I talked to the doctors at Mount Sinai, and they said lots of first responders from Ground Zero were having kidney failure. He came down with skin cancers, all these growths everywhere. It was awful. He developed blood disorders and had to have blood transfusions constantly. He was just a mess.

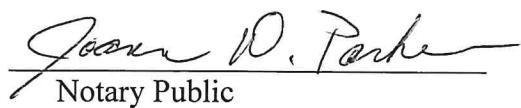
10. Victor would get severe cramping, so bad that he would cry out in pain. He would be so exhausted that he couldn't get up off the couch. He couldn't bathe himself. He had difficulty breathing. He had a feeling of malaise—he just couldn't function anymore. That was both from the psychological trauma and his physical illness. He was in a lot of pain before and after his dialyses. He had bone marrow testing as well, which was extremely painful for him. He also had a huge mental change. Sometimes, he would just sit and weep. I remember he developed neuropathy from his diseases, where he couldn't feel his limbs. He would sit in the racecar that he built and weep because his legs were numb, and he couldn't feel the pedals with his feet.

11. Victor was a very good man. He didn't need to stay at the NYSE that day to help, but he was out there helping people. He stayed to be a team player, and it cost him his life. He was a good man, a good father. My family lost a lot. We lost him that day. When Victor became permanently disabled, we lost a source of income for our family. When Victor died, I had to move houses because I couldn't afford our house anymore. If Victor was with us, he could've helped our children with their weddings and grandkids. All of that is gone. I lost my husband. I hope that those who caused or contributed to these attacks are held accountable for their actions. They'll never compensate for the loss of a life, but maybe this will allow families to move forward.



Angelina Casalett  
ANGELINA CASALETTO

Sworn to before me this  
24<sup>th</sup> day of April, 2022



Notary Public

JOANN D. PARKER  
A Notary Public of New Jersey  
My Commission Expires July 23, 2026

**Estate of Joseph Patrick Cassella**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

ELAINE E. MANDELKOW, et al.,

**AFFIDAVIT OF  
JAMES VINCENT CASSELLA**

Plaintiffs,

20-CV-00315 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

STATE OF NEW JERSEY )  
: SS.:  
COUNTY OF SOMERSET )

JAMES VINCENT CASSELLA, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 6 Prospect Drive, Somerville, New Jersey 08876.

2. I am currently 55 years old, having been born on January 19, 1967.

3. I am the son of Joseph Patrick Cassella, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of the claim on behalf of my father's estate.

4. On October 16, 2016, my father died from pulmonary fibrosis and interstitial lung disease. It was medically determined that these illnesses were causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. On November 2, 2016, I was issued Letters Testamentary on behalf of my father's estate in the Surrogate's Court of the State of New York, Queens County.

6. My father and I had a typical father-son relationship. We spent holidays, grandkids birthdays, and special occasions together. We spoke frequently on the phone, as we lived about an hour away from each other. My father lived in Jackson Heights, New York, and I lived in Somerville, New Jersey. I also traveled a lot internationally for business, which made it

hard to physically see him. But I would always FaceTime, text, and call him. I have lots of love, admiration, and respect for my father.

7. September 11, 2001, started out like any typical day for my father. He was in Brooklyn having breakfast with his crew. He worked as a mason for the City of New York in the Bridge Maintenance Program. He saw the first plane hit the World Trade Center from his location in Brooklyn. He was called to respond to the location, as were all city employees. He was deep in the heart of Ground Zero, assisting with recovery efforts. On that day, I couldn't get in touch with him because all the phone lines were down. We had many family members calling, asking me if he was okay. He worked 12-18 hours per day, 7 days per week for an extended period of time. Weeks, if not months. He suffered back pain from all the physical work. He told me it was a hard environment to breathe in and that there was a lot of chaos. He saw very disturbing things, like deceased victims from the plane crash still strapped into their seats. He described long, hard hours, and people working together. It was a very sad time and an experience he never expected. What he witnessed deeply scarred him.

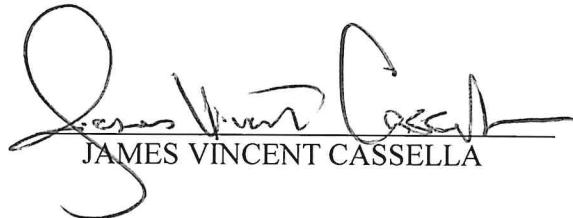
8. Shortly after he retired, my dad began to have issues breathing. At first, we just attributed it to old age and the fact that he had a physical job. He was tired a lot and wasn't feeling right. It was out of the ordinary, since my father was physically strong and active. He was used to hard, physical work, having worked in the masonry trade since he was a teenager. His doctor did some X-rays of his chest, and he was then referred to a pulmonary specialist. That specialist made the connection between his condition and his 9/11 exposure. In late 2014, my dad was diagnosed with pulmonary fibrosis.

9. My father suffered many symptoms of pulmonary fibrosis. He developed a cough and rashes on the trunk of his body. He had shortness of breath and was unable to do many of the normal activities he could easily do a year prior. Even walking short distances unassisted became difficult for him. About a year prior to his passing, he could no longer drive. In his masonry job, he was able to keep up with people half his age well into his late sixties. So, it was embarrassing for him to lose his physical capabilities. His illness also impacted his mental health. He became depressed. There were periods of time where he'd call me up and tell me he was just miserable. His illness definitely had a negative impact on his mental wellbeing. I also recall that he developed a few basal cell carcinomas, which had to be removed.

10. My father's breathing problems continued to worsen. In late 2015, he had to start using an oxygen tank. The doctors put him on a number of drugs to open up his airways. He had a Symbicort inhaler and an Albuterol inhaler. He did treatments to increase his lung capacity. He saw many different doctors and respiratory therapists. He went for second and third opinions. Toward the end, we had in-home care for him. It was hard to watch him deteriorate.

11. I thought we would have so much more time together. My father didn't even live as long as his parents. He was just entering retirement. He lost out on spending time with his children and grandchildren. He wanted to buy a condo in Florida and be with his grandkids. My father worked so hard his whole life and was not able to reap the rewards. He should still be here enjoying life.

12. My father was selfless on the day of 9/11. He saw it as his responsibility to respond to the World Trade Center. Even if he had known what dangers were ahead of him, he still would have gone down there to help. He made a sacrifice. He was selfless. We were robbed of the time we should've had with him. I'm glad to see that his name was included in the memorial of those who died of 9/11-related illnesses on Long Island. I wish we had more years together.



JAMES VINCENT CASSELLA

Sworn to before me this  
15<sup>th</sup> day of June, 2022

Tiago Ferreira  
Notary Public



June 15, 2022

## **Estate of Pat Chirico**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
ELAINE E. MANDELKOW, et al,

**AFFIDAVIT OF  
LILLIAN CHIRICO**

Plaintiffs,

v.

20-CV-00315 (GBD)(SN)

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X  
STATE OF FLORIDA        )  
                            :  
COUNTY OF SEMINOLE    )  
                            :  
                            SS.:

LILLIAN CHIRICO, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 2861 Sweetspire Circle, Oviedo, Florida 32766.

2. I am currently 60 years old, having been born on July 11, 1961.

3. I am the wife of Pat Chirico, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of the claim on behalf of my husband's estate.

4. On December 27, 2017, my husband died from liver cancer. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. On February 26, 2018, I was appointed personal representative of my husband's estate by the Circuit Court for Seminole County, Florida, Probate Division.

6. Pat and I had a wonderful relationship. We enjoyed going away on vacation and were especially fond of taking cruises. We loved going on drives together, hosting barbecues, and going to Las Vegas for our anniversary. We had a very good life together and always got along well.

7. Pat was working as a police officer on September 11, 2001. He performed security and traffic control duties down at the World Trade Center. He worked all the time. He spent months working near the World Trade Center.

8. About a year before he died, Pat started to get sick. He would often complain of headaches, and his energy level started to decrease. He was still working as a police officer during this time. He was always tired and had no energy to do things he always like to do, like going on walks. Soon, we were going to doctor's offices every weekend, trying to figure out what was wrong with him. When Pat was diagnosed with cancer, we were both completely shocked and devastated.

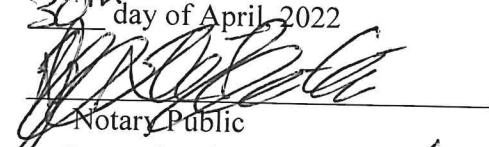
9. Pat resisted going for cancer treatments. He knew it was quite expensive, and he was afraid treatment would deplete our money and there wouldn't be enough to take care of the family. He didn't want to go broke undergoing all of the necessary cancer testing. He wanted to make sure I was taken care of.

10. In early December 2017, Pat woke up and started spitting up blood. He passed out right on the floor. We brought him to the hospital, where he went into a coma. The doctors told me that his organs were shutting down. I kept telling them to let him be. I tried to keep him alive for three weeks. The doctors wanted to put him in hospice in a room of his own. Then, they wanted to bring him out of the coma and send him home to die. I really believed that he'd come out of the coma in the hospital and be alright. I didn't want him to go right away. I wasn't ready to lose him. I thought I could save him. Sadly, it wasn't meant to be.

11. My husband was a very good and kind person. He suffered so greatly for just doing his job. This should have never happened to him.

  
LILLIAN CHIRICO

Sworn to before me this  
30<sup>th</sup> day of April, 2022

  
Notary Public

  
Jeimie De Jesus Colon



Jeimie De Jesus Colon  
Comm.: HH232384  
Expires: Feb. 22, 2026  
Notary Public - State of Florida

STATE OF FLORIDA  
COUNTY OF SEMINOLE  
SWORN TO AND SUBSCRIBED  
BEFORE ME THIS 30<sup>th</sup> DAY OF  
April, 2022 BY Lillian Chirico  
TYPE OF IDENTIFICATION FL  
Driver's License

**Estate of Christopher Christofilakes**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
ELAINE E. MANDELKOW, et al.,

Plaintiffs,

20-CV-00315 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X  
STATE OF NEW JERSEY )  
: SS.:  
COUNTY OF MONMOUTH)

ROSE CHRISTOFILAKES, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 182 Tarpon Drive, Sea Girt, NJ 08750.

2. My current age is 62, having been born on March 5, 1960.

3. I am the wife of Chris Christofilakes, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of the claim on behalf of my husband's estate.

4. My husband passed away from glioblastoma on January 8, 2012. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. On March 27, 2014, I was appointed personal representative of my husband's estate by the Richmond County, New York Surrogate's Court.

6. Chris was my first love and my best friend. We did everything together as husband and wife. We raised three kids together. We did the typical couple things, like going out to dinner, and we renovated a house together. We had a whole plan for the future. Chris

loved to play golf, and I was taking some golf lessons so that when we finally got to retire we could play together. We liked to vacation together, hang out with friends, the usual stuff.

7. Chris worked as a court officer. On September 11<sup>th</sup> 2001, he was working in Manhattan. As soon as he learned of the attacks on the World Trade Center, he went running down there to help in whatever way he could. He spent a few days working on search and recovery at Ground Zero. We forced him to wear a mask, since my sister-in-law is a respiratory therapist and she knew the air wasn't clean. No one was wearing them at the time, so we don't know if he kept his mask on, although he said he did. His bosses later sent him to Centre Street, where he worked directing traffic and making sure the area was secure. Chris worked at the courts on Centre Street and Beaver Street until his retirement in December 2011.

8. Years later, while we were on vacation celebrating our anniversary, his arm started spasming and moving on its own. Chris had recently had an injury and was scheduled to have surgery, so we mentioned it to the surgeon. The surgeon sent us to a neurologist. The neurologist did an MRI with contrast, which revealed a mass in Chris's brain. He was diagnosed with Stage IV glioblastoma. We talked to different doctors before finding a surgeon at Columbia to remove Chris's brain tumor. After the surgery, he did a few rounds of chemotherapy. They gave him a special chemo for brain cancer. They also radiated right onto the brain mass. It gave him some time, but later the cancer started to come back. The radiation was just too much on his brain—I don't think he would've wanted to go through more pain.

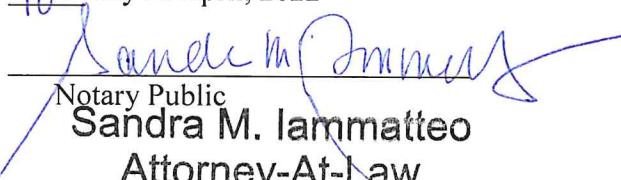
9. As Chris's condition worsened, he would pretty much have to have someone watching him at all times. At first, he could feed himself and watch TV, but at the end he was getting confused and lost the ability to be independent. He lost a lot of weight, and his arm didn't work anymore. He couldn't get in and out of bed, he had difficulty walking, and he became incontinent. His quality of life significantly declined toward the end. He couldn't speak, couldn't communicate, feed himself, or anything like that. I just didn't expect it to all happen so fast. He was diagnosed and passed away within two years.

10. Chris was so loved. He was just like the mayor, he had so many friends. There were so many people at the house to see him while he was sick. He loved life, and he was so personable. We had many laughs together, so many good memories together. We were high school sweethearts. He missed a lot. He missed endless family celebrations, weddings, and grandchildren. It was terrible to watch him go that way. In normal times, he was such a verbal,

outgoing person. He made everybody laugh. Seven or eight months before his death, he couldn't write or communicate in any way. We tried with pictures, but he couldn't get his message across. When someone's at the end of their life, especially when it's someone you love, there's so many things you want to say to them. And we weren't able to do that. That's my biggest regret. So, if you love someone, tell them.

  
ROSE CHRISTOFILAKES

Sworn to before me this  
18<sup>th</sup> day of April, 2022

  
Notary Public  
Sandra M. Iammatteo  
Attorney-At-Law  
State of New Jersey

**Estate of Thomas DeFrancisci**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
ELAINE E. MANDELKOW, et al.,

**AFFIDAVIT OF  
ROSEMARY DEFRENCISCI**

Plaintiffs,

20-CV-00315 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X  
STATE OF NEW YORK      )  
                              : SS.:  
COUNTY OF NASSAU      )

ROSEMARY DEFRENCISCI, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 2094 Bergen Street, Bellmore, New York 11710.
2. I am currently 60 years old, having been born on July 26, 1961.
3. I am the wife of Thomas (Tommy) DeFrancisci, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of the claim on behalf of my husband's estate.
4. On April 12, 2019, my husband died from lung cancer. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.
5. I am the proposed personal representative of my husband's estate.
6. I was very blessed to meet Tommy at a young age. I was nineteen and he was twenty-three. From the time we met, we were pretty closely involved in each other's lives. We were married for nearly thirty-three years when he passed. Without a doubt, we were best

friends.

7. Tommy was an EMT for the Bellmore Ambulance Corps, a job he loved. He was always one to help people. It's what he lived for. He responded to the World Trade Center site on 9/11. He was very close to the action. He was actually near a building that was in the process of crumbling. He was assisting other emergency responders and the NYPD in the area near the World Trade Center. When he drove his ambulance back home, it was covered in soot. I remember the clothes he wore to the site were covered in dust as well.

8. Around the end of 2008, Tommy developed a bad cough. He went for some testing, and then some more testing. What we thought was a simple cough turned out to be a unique lung tumor. We were surprised—he was a totally healthy man, very active and health-conscious. Through the years, Tommy went through many treatments which he endured with tremendous bravery.

9. Thomas suffered many side-effects of his treatments. He lost all of his hair and had often debilitating nausea. He also suffered greatly from the progression of his disease. Eventually, he wasn't able to eat any more and experienced immense pain whenever he tried to digest food. There were tumors growing in his digestive cavity. He became bloated and had to have his abdomen tapped because fluid was collecting inside him. He had lower energy, lower mobility, and lower spirits. That was the hardest thing to watch. I saw that his positivity was starting to turn. He just became a very different person.

10. Tommy was a tremendously supportive family man. He was responsible, cared deeply for his family, and he had willingness to self-sacrifice. He provided a profound sense of security to his family. He died way too early. Our children now have children of their own, and Tommy is not here to enjoy them. That hurts me for them. He would have been a wonderful, loving grandfather as they grew. He's missing out on that privilege.

11. If Tommy had the chance, he would do again exactly what he did on 9/11. That's who he was. A very giving, caring person. For all the suffering he endured, he wouldn't hesitate to put himself on the line again. He never felt sorry for himself when he got sick. His only concern was that he knew he wouldn't always be there to protect his family. That was his saddest point. Unfortunately, he lost his battle with cancer, but he left behind more than he'll ever know.

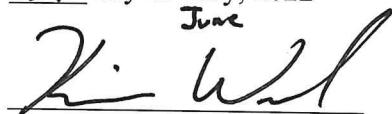
He didn't deserve to be taken from me, from his kids and his grandkids. That's the saddest thing.  
He had so much more of life left to live.

  
ROSEMARY DEFRAZCISCI

Sworn to before me this

29 day of ~~May~~, 2022

~~June~~



Notary Public

KEVIN WARD  
NOTARY PUBLIC - STATE OF NEW YORK  
NO. 01WA6420758  
QUALIFIED IN NASSAU COUNTY  
COMMISSION EXPIRES 08/16/2025

**Estate of Thomas P. Doepfner**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X

In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
ELAINE E. MANDELKOW, et al.,

**AFFIDAVIT OF  
JOANNE DOEPFNER**

Plaintiffs,

20-CV-00315 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW YORK      )  
                              : SS.:  
COUNTY OF QUEENS      )

JOANNE DOEPFNER, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 15-55 201<sup>st</sup> Street, Bayside, New York 11360.

2. I am currently 63 years old, having been born on January 7, 1959.

3. I am the wife of Thomas P. Doepfner, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of the claim on behalf of my husband's estate.

4. On April 6, 2016, Thomas died from metastatic melanoma, at the age of 58. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. On September 13, 2016, I was issued Letters Testamentary on behalf of my husband's estate by the Queens County, New York Surrogate's Court.

6. Thomas and I were very close. We were college sweethearts and were married for over thirty years. We raised two beautiful children together. We had a wonderful relationship with no difficulties. Thomas supported me, and I supported him.

7. Thomas was working for the New York Police Department on 9/11. He was working at NYPD Headquarters, located at 1 Police Plaza. Immediately following the attacks, he went down to Ground Zero to help out. He was the Assistant Deputy Commissioner of Legal Affairs. He was upset and angry that such a thing had happened and was quite emotional over it. He was worried for a long time. Thomas and I had many friends in the FDNY and NYPD, and the losses were troubling to us. On the day of the attacks, he and I tried contacting family and friends to make sure everyone was okay. It was all quite upsetting because the phone lines were down, and it was difficult to get through to anyone. Thomas went to work every day, assisting in recovery efforts and spending time between his office and Ground Zero. He worked for the NYPD for over 30 years.

8. After 9/11, Thomas started to lose energy. He was generally a healthy person who lived an active lifestyle. He played golf, softball, and was involved in coaching our children's sports teams. Several years after 2001, he was diagnosed with prostate cancer. He had a successful prostatectomy, and the doctors removed his tumor. He went for regular testing after that. In 2015, Thomas was diagnosed with Stage IV melanoma. By the time the doctors found it, it had spread to his brain. He went through brain surgery, radiation, and regular follow-ups, including lots of bloodwork, CAT scans, and PET scans. Thomas was treated at North Shore Manhasset Hospital and Monter Cancer Center in New Hyde Park.

9. Thomas had scarring and bruising all over his body as a result of the melanoma. There was a change in his physical appearance. He lost weight and didn't appear as healthy or vibrant as he was in the past. He also suffered from kidney failure and had to go on dialysis. He had at-home dialysis, which was a draining and time-consuming procedure. But he was a very determined man. He didn't want to give in to his illness and back away from his life. He wanted to still spend time with his family and friends and be able to golf and do the activities he enjoyed. And he did. Eventually, his condition worsened, and he could no longer be self-sufficient. When the cancer spread to his brain, his mental capacity diminished. His recall worsened, and he became forgetful. He could no longer drive, which was a significant change for him. That took away his independence, which he thrived on.

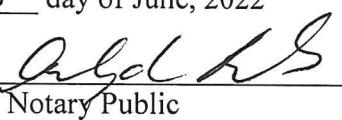
10. Thomas was a good man and a wonderful family man. He was very involved with our children and was a wonderful father. He was very proud of his job and hated having to retire from the NYPD. He was a role model for many of his colleagues, as well as to our children. He

suffered a terrible illness and was taken far too soon for doing what he loved—his job. His death was a true loss. We are reminded of that every day. Thomas didn't live long enough to see our daughter graduate from nursing school and get her nurse practitioner degree. He wasn't there to walk her down the aisle at her wedding or cheer for her as she bought her first home. He wasn't there for our son's achievements. He missed out on so many things he would have been overjoyed about. It was a great loss for everyone, but especially for me. He was my college sweetheart. He was my rock. It was a great loss for my kids as well. He would do anything for his family.



JOANNE DOEPFNER

Sworn to before me this  
16 day of June, 2022



Notary Public

